

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.,

Plaintiff,

v.

THE REPUBLIC OF CUBA,

Defendant.

Case No. 12-CV-01596
(AKH)

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.; and

JEANETTE FULLER HAUSLER, and WILLIAM FULLER as
court-appointed co-representatives of the ESTATE OF ROBERT
OTIS FULLER, deceased, on behalf of all beneficiaries of the
Estate and the ESTATE OF ROBERT OTIS FULLER; and

ALFREDO VILLOLDO, individually, and
GUSTAVO E. VILLOLDO, individually and as Administrator,
Executor, and Personal Representative of the ESTATE OF
GUSTAVO VILLOLDO ARGILAGOS,

Petitioners,

v.

BANCO BILBAO VIZCAYA ARGENTARIA (S.A.); BANK OF
AMERICA N.A.; BANK OF NEW YORK MELLON;
BARCLAY'S BANK PLC; CITIBANK N.A.; CREDIT SUISSE
AG, NEW YORK BRANCH; DEUTSCHE BANK TRUST
COMPANY AMERICAS; HSBC BANK (HSBC BANK USA,
N.A.); INTESA SANPAOLO S.P.A.; JP MORGAN CHASE
BANK, N.A.; RBS CITIZENS, N.A.; ROYAL BANK OF
CANADA; SOCIETE GENERALE; UBS AG; WELLS FARGO
BANK, NA; BROWN BROTHERS HARRIMAN & CO.;
MERCANTIL COMMERCEBANK, N.A.; STANDARD
CHARTERED BANK; AND BANCO SANTANDER, S.A.,

Respondents/Garnishees.

**PETITIONERS'
REPLY
MEMORANDUM IN
SUPPORT OF
MOTION TO
COMPLETE
TURNOVER OF
PHASE I ACCOUNTS
NOT IN DISPUTE**

In their opposition memoranda the Respondent banks do not claim entitlement to the Phase 1 blocked and uncontested accounts (identified in Exhibits 1 thru 10, filed under seal, of the Swift Declaration) but question (a) the inclusion of certain accounts in Phase 1, (b) whether certain accounts were contested, and (c) the content of the proposed form of Turnover Order. After discussion with the banks, Petitioners have filed with the Court Amended Exhibits 1, 3, 4, 5, 6, 7 and 10 which delete certain accounts and add others. Petitioners have exchanged with the Respondent banks a revised form of proposed turnover order and expect to have a conference call with bank counsel next week to resolve any differences. By October 10, Petitioners expect to submit a revised proposed turnover order to the Court. Also by October 10, Petitioners will submit a supplemental memorandum addressing Cuban government attribution of the newly added blocked accounts listed in the aforementioned Amended Exhibits.

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